

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MICROSOFT CORPORATION,

Plaintiff,

vs.

BUY CHEAP SOFTWARE, INC., a
California corporation, d/b/a
BUYCHEAPSOFTWARE.COM;
SOFTMAN PRODUCTS, LLC, a
California limited liability company; and
JONATHAN DRACUP, an individual,

Defendants.

Case No. **2:15-cv-7192 GW (JEMx)**

**STIPULATED PERMANENT
INJUNCTION**

STIPULATION

Plaintiff Microsoft Corporation and Defendants Buy Cheap Software, Inc. and Jonathan Dracup, by and through their respective counsel of record, hereby stipulate and agree to entry of the following permanent injunction:

PERMANENT INJUNCTION

Pursuant to the settlement of this matter, and the parties' agreement in connection therewith to stipulate to a permanent injunction, IT IS HEREBY ORDERED that Defendants, their directors, principals, officers, agents, representatives, employees, attorneys, successors and assigns are enjoined and restrained from:

1. Copying or making any other infringing use or infringing distribution of Microsoft's software and other intellectual property;
2. Manufacturing, assembling, producing, distributing, offering for distribution, circulating, selling, offering for sale, advertising, importing, promoting or displaying any Microsoft software or other intellectual property bearing any simulation, reproduction, counterfeit, copy, or colorable imitation of any of Microsoft's registered trademarks, service marks, or copyrights;
3. Using any unauthorized simulation, unauthorized reproduction, counterfeit, copy, or colorable imitation of Microsoft's registered trademarks, service marks or copyrights in connection with the manufacture, assembly, production, distribution, offering for distributing, circulation, sale, offering for sale, import, advertisement, promotion, or display of any software, component, and/or other item not authorized or licensed by Microsoft;
4. Using any false designation of origin or false or misleading description or false or misleading representation that can or is likely to lead the trade or public or individuals erroneously to believe that any software,

component, and/or other item has been manufactured, assembled, produced, distributed, displayed, licensed, sponsored, approved or authorized by or for Microsoft, when such is not true in fact;

5. Engaging in any other activity constituting an infringement of any of Microsoft's trademarks, services marks, and/or copyrights, or of Microsoft's rights in, or right to use or to exploit, such trademarks, services marks and/or copyrights; and/or

6. Assisting, aiding, or abetting any other person or business entity in engaging in or performing any of the activities listed above.

IT IS SO STIPULATED.

DATED: August 30, 2016

DAVIS WRIGHT TREMAINE LLP
BONNIE E. MACNAUGHTON
ANNA R. BUONO
JAMES H. CORNING

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LAWRENCE E. HELLER

By: /s/

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SOFTWARE, INC. and JONATHAN
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